

Planning Policy Comments

Application No	APP/22/00578
Address	Land Adjacent to L'Esperance, Victoria Road, Hayling Island
Development	Erection of 1No. 3 bed detached dwelling with garage.
Case Officer	GS
Comments By	JB
Date of Comments	4 October 2022

Policy Status

The [Local Plan \(Core Strategy\)](#) and the [Local Plan \(Allocations\)](#), together with the Hampshire Minerals and Waste Plan form the development plan for the borough. The Council has also adopted a [Housing Delivery Position Statement](#), which is a material consideration.

Principle of Development

The site lies within the urban area as defined by policies AL2 and CS17 of the Local Plan. There is a presumption in favour of sustainable development in these areas.

Flood Risk

It is noted that the applicant has not considered flood risk in their submission.

The site lies in current Flood Zone 1 as defined by the Environment Agency's Flood Risk map for planning. However, [the Partnership for South Hampshire Strategic Flood Risk Assessment](#) shows the site to be at risk in the future when climate change is taken into account. The Climate Change Flood Map for Havant from that SFRA, can be viewed at: <http://maps.havant.gov.uk/havant.aspx>. An extract for this site is shown below, on which the pink shading denotes future flood risk:



In accordance with Policy CS15 of the Core Strategy, chapter 14 of the NPPF and [NPPG on Flood Risk](#), the future risk triggers the need for a site specific Flood Risk Assessment (FRA), and a Sequential Test.

Footnote 55 of the NPPF states that: 'A site-specific flood risk assessment should be provided for all development in Flood Zones 2 and 3. **In Flood Zone 1, an assessment should accompany all proposals involving:** sites of 1 hectare or more; land which has been identified by the Environment Agency as having critical drainage problems; **land identified in a strategic flood risk assessment as being at increased flood risk in future;** or land that may be subject to other sources of flooding, where its development would introduce a more vulnerable use.'

It should be noted that even where a flood risk assessment shows the development can be made safe throughout its lifetime without increasing risk elsewhere, the sequential test still needs to be satisfied.

The sequential approach is designed to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk. This means avoiding, so far as possible, development in current and future medium and high flood risk areas. The sequential test is the mechanism by which an applicant must demonstrate that there

are no reasonably available alternative sites at lower risk that could accommodate the development. The Sequential Test should be applied to 'Major' and 'Non-major development' proposed in areas at risk of flooding ([Paragraph 023 NPPG](#)). Areas at risk of flooding are those at risk of flooding from any source, now or in the future ([Paragraph 001 NPPG](#)).

While the sequential test can not be pre-judged, it is considered likely that there are other reasonably available alternative sites at lower risk in the borough that could accommodate a single dwelling.

If the sequential test is passed (i.e. it is demonstrated that there are no reasonably available alternative sites within the borough), the proposal would also need to pass the exception test. This test requires the development to be safe for its lifetime and to provide wider sustainability benefits to the community that outweigh the flood risk.

Conclusion

While the location of the site within the defined settlement boundary indicates suitability for development in principle, flood risk has not been adequately considered in regard to this proposal. It has not been demonstrated that there are no lower risk sites available in the borough, nor that development on this site would be safe for its lifetime.

The applicant could be invited to address these issues. However, while the sequential test cannot be pre-judged it is considered likely that there are other reasonably available sites at lower risk of flooding that could accommodate this development. If there are such sites, the sequential test would not be passed, and the policy recommendation would be for refusal of the application.